

KUTAK ROCK LLP

Loc Pfeiffer, VSB #39632

Alison W. Feehan, VSB #35225

1111 East Main Street, Suite 800

Richmond, Virginia 23219

804-644-1700

Loc.Pfeiffer@KutakRock.com

Alison.feehan@kutakrock.com

Counsel for Bruce Robinson, Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE: WILLIAM ANDREW KARO,

Case No. 13-33011

Chapter 7

Debtor.

**NOTICE OF TRUSTEE'S MOTION FOR SANCTIONS FOR FAILURE TO COMPLY
WITH ORDER REQUIRING PRODUCTION OF DOCUMENTARY EVIDENCE,
MOTION TO COMPEL DEBTOR'S PRIOR COUNSEL TO COMPLY WITH
SUBPOENAS AND 11 U.S.C. §542(e), AND MOTION TO EXAMINE
PRIOR COUNSEL PURSUANT TO RULE 2004**

PLEASE TAKE NOTICE THAT the following pleading was filed by Bruce Robinson, Trustee for the Bankruptcy Estate of William A. Karo: *Motion for Sanctions for Failure to Comply with Order Requiring Production of Documentary Evidence, Motion to Compel Debtor's Prior Counsel to Comply with Subpoenas and 11 U.S.C. §542(e), and Motion to Examine Prior Counsel Pursuant to Rule 2004.*

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the Court to grant the relief sought in the motion, you must do the following:

1. You must file with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 9013-1 and 2004-1 ***not later than seven days after the filing date of this Motion.***

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

2. You must also mail a copy to:

Alison W. Feehan, Esquire
Kutak Rock LLP
1111 East Main Street, Suite 800
Richmond, Virginia 23219

3. No hearing has been set to consider the Motion. If a hearing is required, you will receive notice of the hearing and you must attend the hearing in addition to filing a written objection to the Motion. If you fail to file timely a written response or attend the hearing, the Court may consider any objection you may have waived and enter an Order granting the relief requested in the Motion.

BRUCE ROBINSON, TRUSTEE

/s/ Alison Feehan

KUTAK ROCK LLP
Loc Pfeiffer, VSB #39632
Alison W. Feehan, VSB #35225
1111 East Main Street, Suite 800
Richmond, Virginia 23219
804-644-1700
Loc.Pfeiffer@KutakRock.com
Alison.feehan@kutakrock.com
Counsel for Bruce Robinson, Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I certify under penalty of perjury that a copy of this document was served by regular mail and/or via ECF on January 22, 2014 as follows:

William A. Karo (via regular mail)
430 North Parham Road
Henrico, VA 23229

Page S. Karo (via regular mail)
430 North Parham Road
Henrico, VA 23229

Charles A. Krumbein, Esquire (via ECF)
Counsel for William A. Karo

Robert A. Canfield, Esquire (via ECF)
Counsel for Page S. Karo

Churchill G. Bowles, Esquire (via regular mail)
P.O. Box 12085
Richmond, VA 23241

/s/ Alison Feehan
Counsel